## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

<b>HEIDI EVERTS, Individually</b>
(FJS/DAP)
and as Executrix of the Estate of
TIMOTHY EVERTS,

Civil Action No. 5:01-CV-0383

Action No. 1

PLAINTIFF'S WITNESS LIST

Plaintiff,

VS.

**ALTEC INDUSTRIES, INC.,** 

ALTEC INDUSTRIES, INC.,

Defendant.

Civil Action No. 5:01-CV-0383 Action No. 2

**Defendant/Third-Party Plaintiff,** 

VS.

NIAGARA MOHAWK POWER CORPORATION,

**Third-Party Defendant.** 

#### Plaintiff's Will Call Witnesses:

1. Michael Anderson Altec Industries, Inc.

Michael Anderson, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

2. Dan Bates

Altec Industries, Inc.

Dan Bates, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

# Jane ButlerP. O. Box 73New Haven, NY 13121(315) 963-3583

Jane Butler, mother of Timothy Everts, is expected to testify concerning damages resulting from Timothy Everts' death, including but not limited to her relationship with Timothy Everts, Timothy Everts' work experience, reputation, as well as any other matter addressed in the witness's deposition.

## 4. Joshua Chard Altec Industries, Inc.

Joshua Chard, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 5. Paul Daino 90 Meaney Circle Oswego, NY (315) 342-0173

Paul Daino is a Niagara Mohawk employee who witnessed accident. Mr. Daino is expected to testify, inter alia, as to facts of accidents, Timothy Everts' work practices, and Niagara Mohawk work rules, training, and education, as well as any other matter addressed in the witness's deposition.

#### 6. Heidi Everts 1935 Cardinal Village Deland, FL 32720 (386) 804-3893

Heidi Everts, widow of Timothy Everts, will testify concerning damages resulting from Timothy Everts' death, including but not limited to her relationship and her daughter's relationship with Timothy Everts and Timothy Everts' work experience, reputation, and other pertinent details, as well as any other matter addressed in the witness's deposition.

### 7. Frank Freudenthal Altec Industries, Inc.

Frank Freudenthal, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 8. John C. Frost, P.E. Safety Engineering Services 2627 Trailway Road, SE Huntsville, AL 35801-1473 (256) 650-6324

John Frost, Plaintiff's safety engineer expert, is expected to testify concerning his analysis of this incident and the product from a safety and human factors perspective. He is expected to testify concerning the negligence of Altec and the design and warnings of the product at issue, as well as the defective and dangerous (not reasonably safe) condition of the product, as well as any other matter addressed in the witness's deposition.

## 9. Richard Hofflemeyer Altec Industries, Inc.

Richard Hofflemeyer, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 10. Matthew Quenneville 40 Goettel Road Central Square, NY 13036 (315) 676-3062

Matthew Quenneville is a Niagara Mohawk employee who witnessed accident. Mr. Daino is expected to testify, inter alia, as to facts of accidents, Timothy Everts' work practices, and Niagara Mohawk work rules, training, and education, as well as any other matter addressed in the witness's deposition.

# 11. Dr. Kenneth W. Reagles K. W. Reagles & Associates 500 Plum Street Syracuse, NY (315) 471-6944

Kenneth Reagles, Plaintiff's economic expert, is expected to testify as to the pecuniary loss to Plaintiff and to the estate of Timothy Everts, as well as any other matter addressed in the witness's deposition.

12. B. Wesley Sherman, Ph.D. 503 E Nifong, Suite 100, PMB 153 Columbia, MO 65201 (573) 875-1170 B. Wesley Sherman, Plaintiff's electrical engineer expert, is expected to testify concerning his investigation of this incident and the defective and not reasonably safe condition of the product, including but not limited to providing an electrical engineering analysis of the hazards associated with the subject product, as well as any other matter addressed in the witness's deposition.

#### 13. Michael Spencer

Altec Industries, Inc.

Michael Spencer, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 14. James Sytsma

Altec Industries, Inc.

James Systma, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 15. Edwin Vollmer

Altec Industries, Inc.

Edwin Vollmer, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 16. Kelly Williams

Altec Industries, Inc.

Kelly Williams, an Altec Industries, Inc., employee is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### Plaintiff's May Call Witnesses:

#### 1. Thomas Baron

Niagara Mohawk Power Corporation

Thomas Baron, Vice President of Field Operations at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 2. Richard Borsellino Niagara Mohawk Power Corporation

Richard Borsellino, Vice President of Construction Operations at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 3. Jerry M. Brown New York State Police Fulton, NY 13069 (315)593-1223

Jerry M. Brown may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000, including but not limited to any post-accident investigation and recreation.

## Jane ButlerP. O. Box 73New Haven, NY 13121(315) 963-3583

Jane Butler, mother of Timothy Everts, is expected to testify concerning damages resulting from Timothy Everts' death, including but not limited to her relationship with Timothy Everts, Timothy Everts' work experience, reputation, as well as any other matter addressed in the witness's deposition.

## 5. Terry Campney Niagara Mohawk Power Corporation

Terry Campney, a division manager at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 6. Brian Carroll

Niagara Mohawk Power Corporation

Brian Carroll, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 7. Roger Cary 154 Russell Road Granby, NY 13069 (315)598-9713

Roger Cary may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000.

#### 8. Paul Cianchetti

Niagara Mohawk Power Corporation

Paul Cianchetti, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 9. David Cleckler

c/o 163 W. Main St.

Dothan, AL 36301

David Clecker, a lineman, is expected to tetify concerning the use of an Altec aerial lift device, lineman work practices, lineman knowledge concerning the Altec aerial lift device, and his own experiences using the Altec aerial lift device.

#### 10. Scott Cole

Niagara Mohawk Power Corporation

Scott Cole, Fleet Management Supervisor at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 11. Ralph E. Dudley

Niagara Mohawk Power Corporation

Ralph E. Dudley, a safety specialist at Niagara Mohawk, may testify concerning, inter alia, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, his participation in post-accident investigation and recreation, any meetings with the Plaintiff's family, as well as any other matters addressed in his previous deposition.

#### 12. Kenneth E. Finch

Niagara Mohawk Power Corporation

Kenneth E. Finch, manager, system forestry for Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 13. Scott Fiorentino

Niagara Mohawk Power Corporation

Scott Fiorentino, supervisor at Niagara Mohawk, may testify concerning, inter alia, Timothy Everts' work practices, Niagara Mohawk work rules, training and education.

## 14. George J. Greene, P.E.19970 Holly Hills DriveLa Rue, TX75770-9756(903) 849-3172

George Green is Plaintiff's mechanical engineer expert. Mr. Greene may provide expert opinion testimony regarding the history and development of the aerial lift device, the negligence of Defendant Altec in the design, manufacture and distribution of the subject Altec insulated aerial lift device, as well as any other matter addressed in the witness's deposition.

#### 15. Richard Grosvent 251 W. First St. Fulton, NY 13069 (315)592-9080

Richard Grosvent may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000.

#### 16. Joe Hawksby

Niagara Mohawk Power Corporation

Joe Hawksby is a Niagara Mohawk lineman who may testify concerning, inter alia, Timothy Everts' work practices, Niagara Mohawk work rules, training and education.

#### 17. Dale Hughes 396 Oswego River Road Phoenix, NY 13135 (315)695-6985

Dale Hughes may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000.

#### 18. Andrew Kudarauskas

Niagara Mohawk Power Corporation

Andrew Kudarauskas, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 19. Lisa Leogrande

168 Russell Road

Fulton, NY 13069

Lisa Leogrande may testify concerning the events of May 8, 2000, involving the Niagara Mohawk line crew on or near her premises.

#### 20. Dorothy M. Mayetta

Niagara Mohawk Power Corporation

Dorothy M. Mayetta, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 21. Michael McDonald

P.O. Box 164 New Haven, NY 13121 (315)963-3729

Michael McDonald may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000.

#### 22. J. Derald Morgan

113 Lansdown

Madison, AL 35758

J. Derald Morgan, an unavailable witness, is expected to testify by deposition. The substance of his testimony may be found in the deposition designations listed below.

#### 23. William Mullady

Niagara Mohawk Power Corporation

William Mullady, the transmission distribution supervisor at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, and Timothy Everts' work practices, as well as any other matter addressed in the witness's deposition.

#### 24. James J. Murphy

Niagara Mohawk Power Corporation

James J. Murphy, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 25. Stephen Nicholson

Niagara Mohawk Power Corporation

Stephen Nicholson, fleet engineer at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk practices in obtaining aerial lift devices and specifications related thereto, including those matters addressed in the witness's deposition.

#### 26. Josh Perkins

1206 Sweetgum Road

McRae, Georgia 31055

Josh Perkins, a lineman, is expected to tetify concerning the use of an Altec aerial lift device, lineman work practices, lineman knowledge concerning the Altec aerial lift device, and his own experiences using the Altec aerial lift device.

#### 27. Howard Prosser, Ph.D., P.E.

Engineering Systems, Inc. 3851 Exchange Avenue Aurora, IL 60504 (630) 851-4566

Howard Prosser is the electrical engineering expert for Third-Party Defendant Niagara Mohawk Power Corp. He may testify concerning those matters addressed in his previous deposition.

#### 28. George A. Rice

Niagara Mohawk Power Corporation

George A. Rice, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 29. Michael Richards 254 County Route 55 Fulton, NY 13069 (315)598-7931

Michael Richards may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000.

## 30. Dr. John Ritter Lee Memorial Hospital Fulton, NY 13069

Dr. John Ritter may testify concerning the nature of electrocution injuries as well as the injuries to Timothy Everts on May 8, 2000.

#### 31. John Ryan

Niagara Mohawk Power Corporation

John Ryan, employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work practices, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, Timothy Everts' work practices, and his participation in post-accident investigation and recreation.

## 32. Heath Sawyer c/o 163 W. Main St. Dothan, AL 36301

Heath Sawyer, a lineman, is expected to tetify concerning the use of an Altec aerial lift device, lineman work practices, lineman knowledge concerning the Altec aerial lift device, and his own experiences using the Altec aerial lift device.

### Michael Schremp Niagara Mohawk Power Corporation

Michael Schremp, superintendent of central region for Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work practices, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, Timothy Everts' work practices, and any post-accident investigation and recreation, as well as any other matters addressed in his previous deposition.

#### 34. Dirk Sharpe c/o 118 W. Fourth St. Tyler, TX 75701

Dirk Sharpe, a lineman, is expected to tetify concerning the use of an Altec aerial lift device, lineman work practices, lineman knowledge concerning the Altec aerial lift device, and his own experiences using the Altec aerial lift device.

#### 35. Christian Shuler 115 Rivermist Drive Fulton, NY 13069 (315)593-7918

Christian Shuler may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000.

#### 36. Robert Shumsky

Niagara Mohawk Power Corporation

Robert Shumsky, a retired lineman, may testify concerning, inter alia, Niagara Mohawk work practices, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, and Timothy Everts' work practices.

#### 37. Kathleen H. Smith

Niagara Mohawk Power Corporation

Kathleen H. Smith, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 38. John Spink

Niagara Mohawk Power Corporation

John Spink, director of field operations at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work practices, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, Timothy Everts' work practices, and any post-accident investigation and recreation, as well as any other matters addressed in his previous deposition.

#### 39. Theodore Stevens

c/o Suite 814, 1125 Grand Blvd.

Kansas City, MO 64106

Theodore Stevens, a lineman, is expected to tetify concerning the use of an Altec aerial lift device, lineman work practices, lineman knowledge concerning the Altec aerial lift device, and his own experiences using the Altec aerial lift device.

#### 40. Kevin P. Sucher New York State Police Fulton, NY 13069 (315)593-1223

Kevin P. Sucher may testify concerning the conditions and events surrounding Timothy Everts' electrocution on May 8, 2000, including but not limited to any post-accident investigation and recreation.

#### 41. Dan Tice

Niagara Mohawk Power Corporation

Daniel Tice, a safety specialist at Niagara Mohawk, may testify concerning, inter alia, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, his participation in post-accident investigation and recreation, any meetings with the Plaintiff's family, as well as any other matters addressed in his previous deposition.

### 42. Edward VanEmmerick Niagara Mohawk Power Corporation

Edward VanEmmerick, a chief line mechanic at Niagara Mohawk, may testify concerning, inter alia, Niagara Mohawk work practices, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, Timothy Everts' work practices, the use of an Altec aerial lift device, lineman knowledge concerning the Altec aerial lift device, as well as any other matters addressed in his previous deposition.

#### 43. David Walsh

Niagara Mohawk Power Corporation

David Walsh, Vice President of Employee Relations at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

#### 44. Michael Walters 1350 S.E. 5<sup>th</sup> Avenue

Melrose, FL 32666

Michael Walters, a lineman, is expected to tetify concerning the use of an Altec aerial lift device, lineman work practices, lineman knowledge concerning the Altec aerial lift device, and his own experiences using the Altec aerial lift device.

## 45. John D. Weagraff Niagara Mohawk Power Corporation

John Weagraff, an employee of Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk lineman classifications, Niagara Mohawk work rules, training and education, his participation in post-accident investigation and recreation, any meetings with the Plaintiff's family, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

### 46. Marty Wilbur Niagara Mohawk Power Corporation

Marty Wilbur, a transportation supervisor at Niagara Mohawk Power Corporation, may testify concerning, inter alia, Niagara Mohawk work rules, training and education, any post-accident investigation and recreation, the use of an Altec aerial lift device, and lineman knowledge concerning the Altec aerial lift device.

- 47. Plaintiff reserves the right to call all witnesses listed by Defendant not objected to by Plaintiffs.
- 48. Plaintiff reserves the right to call all witnesses needed for rebuttal or impeachment testimony.
- 49. Plaintiff reserves the right to call all witnesses needed to authenticate documents used at trial.

#### Plaintiff's Witnesses by Deposition Testimony:

<u>Deponent</u>	<u>Date</u>	Case	Page/Line <u>Designations</u>
Anderson, Carl Michael	06/27/2002	Everts v. Altec Industries, Inc.	Pg. 2, Lines 1 thru 12 Pg. 3, Lines 1 thru 4 Pg. 4, Line 21 thru Pg. 5, Line 14 Pg. 5, Line 20 thru Pg. 6, Line 18 Pg. 7, Line 6 thru Pg. 8, Line 11 Pg. 8, Lines 16 thru Pg. 9, Line 2 Pg. 9, Lines 11 thru 17 Pg. 9, Line 23 thru Pg. 10, Line 17 Pg. 11, Lines 12 thru 23 Pg. 12, Lines 14 thru 25 Pg. 13, Lines 3 thru 19 Pg. 14, Line 8 thru Pg. 15, Line 5 Pg. 15, Lines 13 thru 21 Pg. 16, Line 6 thru Pg. 18, Line 6

Pg. 19, Lines 8 thru 13
Pg. 19, Line 22 thru Pg. 21, Line 4
Pg. 22, Line 10 thru Pg. 23, Line 1
Pg. 23, Line 25 thru Pg. 24, Line 21
Pg. 25, Line 22 thru Pg. 26, Line 6
Pg. 27, Line 15 thru Pg. 28, Line 15
Pg. 28, Line 20 thru Pg. 29, Line 8
=
Pg. 29, Line 21 thru Pg. 30, Line 3
Pg. 30, Line 23 thru Pg. 31, Line 3
Pg. 31, Line 24 thru Pg. 32, Line 15
Pg. 34, Line 24 thru Pg. 35, Line 8
Pg. 36, Line 24 thru Pg. 37, Line 4
Pg. 37, Line 13 thru Pg. 37, Line 20
Pg. 38, Line 4 thru Pg. 39, Line 20
Pg. 43, Line 16 thru Pg. 44, Line 20
Pg. 45, Lines 3 thru 21
Pg. 46, Line 4 thru Pg. 47, Line 1
Pg. 47, Lines 6 thru 13
Pg. 51, Line 21 thru Pg. 52, Line 12
Pg. 52, Line 23 thru Pg. 55, Line 4
Pg. 56, Line 2 thru Pg. 57, Line 11
Pg. 58, Lines 9 thru 23
Pg. 59, Line 21 thru Pg. 60, Line 5
Pg. 61, Lines 2 thru 5
Pg. 61, Line 9 thru Pg. 62, Line 11
Pg. 62, Line 17 thru Pg. 63, Line 6
Pg. 64, Line 15 thru Pg. 65, Line 1
Pg. 65, Line 15 thru Pg. 66, Line 21
Pg. 67, Lines 3 thru 12
Pg. 68, Line 24 thru Pg. 69, Line 4
Pg. 69, Line 25 thru Pg. 70, Line 6 Pg. 70, Lines 15 thru 23
Pg. 71, Lines 1 thru 16
Pg. 72, Lines 2 thru 6
Pg. 72, Line 24 thru Pg. 73, Line 9
Pg. 73, Line 19 thru Pg. 74, Line 9
Pg. 74, Lines 16 thru 25
Pg. 75, Line 2 thru Pg. 77, Line 3
Pg. 77, Lines 6 thru 12
Pg. 78, Line 24 thru Pg. 79, Line 4
Pg. 79, Line 20 thru Pg. 80, Line 19
Pg. 80, Line 21 thru Pg. 81, Line 5
Pg. 81, Line 12 thru Pg. 82, Line 15
Pg. 83, Lines 15 thru 19
Pg. 83, Line 24 thru Pg. 84, Line 25
Pg. 85, Lines 7 thru 24
- 6. 55,5, 1 444 2.

			Pg. 86, Lines 9 thru 19
Chard, Joshua T.	01/17/2003	Everts v. Altec Industries, Inc.	Pg. 2, Lines 1 thru 12 Pg. 3, Line 1 thru Pg. 4, Line 12 Pg. 7, Line 23 thru Pg. 10, Line 10 Pg. 10, Line 17 thru Pg. 11, Line 11 Pg. 11, Line 22 thru Pg. 12, Line 21 Pg. 14, Lines 9 thru 11 Pg. 15, Line 24 thru Pg. 16, Line 11 Pg. 16, Line 20 thru Pg. 17, Line 7 Pg. 17, Line 23 thru Pg. 18, Line 7 Pg. 18, Line 9 thru Pg. 19, Line 17 Pg. 19, Line 19 thru Pg. 20, Line 15 Pg. 20, Line 18 thru Pg. 21, Line 10 Pg. 21, Line 13 thru Pg. 22, Line 8 Pg. 22, Lines 10 thru 19 Pg. 22, Lines 10 thru 19 Pg. 25, Lines 20 thru 25 Pg. 26, Line 2 thru Pg. 27, Line 11 Pg. 27, Line 22 thru Pg. 28, Line 2 Pg. 28, Line 5 thru Pg. 30, Line 14 Pg. 31, Line 15 thru Pg. 33, Line 3 Pg. 33, Line 15 thru Pg. 34, Line 17 Pg. 35, Line 8 thru Pg. 37, Line 3 Pg. 37, Line 6 and 7 pg. 37, Line 9 thru Pg. 38, Line 17 Pg. 39, Lines 9 thru 16 Pg. 40, Line 14 thru Pg. 41, Line 7 Pg. 46, Lines 4 thru 7 Pg. 46, Lines 6 thru 21 Pg. 49, Lines 12 thru 23 Pg. 51, Lines 13 thru Pg. 52, Line 8 Pg. 49, Lines 7 thru 10 Pg. 49, Lines 10 thru Pg. 53, Line 4 Pg. 51, Line 13 thru Pg. 55, Line 9
			Pg. 55, Line 16 thru Pg. 57, Line 2

Pg. 57, Lines 19 thru 21
Pg. 58, Line 10 thru Pg. 59, Line 9
Pg. 59, Line 11 thru Pg. 60, Line 2
Pg. 60, Line 7 thru Pg. 62, Line 9
Pg. 62, Line 24 thru Pg. 63, Line 1
Pg. 63, Lines 3 thru 9
Pg. 63, Line 15
Pg. 63, Line 17 thru Pg. 64, Line 22
Pg. 65, Lines 1 thru 19
Pg. 65, Lines 21 thru 24
Pg. 66, Lines 1 and 2
Pg. 66, Line 8 thru Pg. 68, Line 7
Pg. 68, Line 10 thru Pg. 69, Line 4
Pg. 69, Lines 13 thru 21
Pg. 70, Line 1 thru Pg. 71, Line 5
Pg. 71, Line 13 thru Pg. 72, Line 10
Pg. 72, Lines 14 thru 22
Pg. 73, Line 1 thru Pg. 74, Line 4
Pg. 74, Line 6 thru Pg. 75, Line 4
Pg. 75, Line 19 thru Pg. 76, Line 2
Pg. 76, Lines 20 thru 22
Pg. 77, Line 23 thru Pg. 78, Line 6
Pg. 78, Line 11 thru Pg. 79, Line 1
Pg. 79, Line 6 thru Pg. 80, Line 7
Pg. 81, Lines 2 thru 9
Pg. 81, Lines 15 thru 19
Pg. 81, Line 24 thru Pg. 82, Line 14
Pg. 82, Line 19 thru Pg. 83, Line 21
Pg. 84, Lines 2 thru 25
Pg. 85, Line 6 thru Pg. 86, Line 15
Pg. 86, Line 23 thru Pg. 88, Line 16
Pg. 88, Lines 23 thru 25
Pg. 89, Lines 2 thru 24
Pg. 90, Lines 11 thru 17
Pg. 91, Lines 9 thru 12
Pg. 93, Line 10 thru Pg. 94, Line 10
Pg. 94, Line 12 thru Pg. 95, Line 1
Pg. 95, Line 3 thru Pg. 98, Line 12
Pg. 98, Line 20 thru Pg. 99, Line 3
Pg. 99, Lines 8 thru 14
Pg. 100, Lines 6 thru 18
Pg. 101, Line 8 thru Pg. 102, Line 16
Pg. 105, Line 1 thru Pg. 106, Line 4
Pg. 106, Lines 9 thru 14
Pg. 106, Lines 16 thru 20
Pg. 108, Line 19 thru Pg. 109, Line 1
1 g. 100, Line 17 unu 1 g. 107, Line 1

			Pg. 109, Lines 3 thru 16 Pg. 109, Lines 18 and 19 Pg. 110, Lines 2 thru 10 Pg. 110, Lines 16 thru 19 Pg. 110, Lines 22 thru 24 Pg. 111, Lines 4 thru 10 Pg. 111, Line 16 thru Pg. 112, Line 12
Mathis, Randy	02/01/2002	Everts v. Altec Industries, Inc.	Pg. 2, Lines 1 thru 12 Pg. 3, Lines 1 thru 23 Pg. 4, Line 20 thru Pg. 5, Line 21 Pg. 6, Lines 16 thru 20 Pg. 7, Lines 19 thru 25 Pg. 8, Lines 4 thru 11 Pg. 9, Line 4 thru Pg. 10, Line 1 Pg. 10, Lines 5 thru 12 Pg. 12, Lines 18 thru 25 Pg. 13, Lines 7 thru 17 Pg. 13, Lines 17 thru 25 Pg. 14, Lines 17 thru 25 Pg. 15, Line 4 thru Pg. 16, Line 10 Pg. 17, Lines 7 thru 10 Pg. 18, Lines 7 thru 10 Pg. 18, Lines 13 thru 20 Pg. 19, Lines 5 thru 24 Pg. 23, Line 4 thru Pg. 24, Line 2 Pg. 27, Lines 8 thru 11 Pg. 27, Lines 8 thru 11 Pg. 27, Lines 4 thru Pg. 28, Line 16 Pg. 29, Lines 4 thru 20 Pg. 30, Lines 5 thru 10 Pg. 30, Lines 5 thru 10 Pg. 31, Lines 13 thru 20 Pg. 32, Lines 4 thru 20 Pg. 33, Lines 7 thru 21 Pg. 34, Lines 13 thru 20 Pg. 35, Lines 7 thru 17 Pg. 36, Line 16 thru Pg. 37, Line 13 Pg. 39, Lines 15 thru 21 Pg. 41, Line 19 thru Pg. 42, Line 10 Pg. 42, Line 22 thru Pg. 43, Line 6 Pg. 44, Line 9 thru Pg. 45, Line 9 Pg. 45, Lines 13 thru 17 Pg. 45, Lines 23 thru 25 Pg. 46, Lines 3 thru 11 Pg. 50, Lines 5 thru 16 Pg. 56, Lines 3 thru 22 Pg. 57, Line 5 thru Pg. 58, Line 5

	I		<del> </del>
			Pg. 59, Line 12 thru Pg. 60, Line 20 Pg. 61, Lines 4 thru 6 Pg. 61, Lines 12 thru Pg. 62, Line 6 Pg. 62, Lines 9 thru 13 Pg. 63, Lines 15 thru 25 Pg. 64, Lines 7 thru 11 Pg. 64, Line 17 Pg. 65, Lines 21 thru 24 Pg. 66, Lines 6 thru 11 Pg. 66, Lines 14 thru 17 Pg. 67, Lines 3 thru 11 Pg. 67, Lines 14 thru 21 Pg. 68, Lines 3 thru 9 Pg. 72, Lines 15 thru 24 Pg. 74, Lines 10 thru 13 Pg. 79, Lines 5 thru 17 Pg. 79, Lines 7 thru 10 Pg. 79, Line 13 thru Pg. 80, Line 5 Pg. 80, Line 9 thru Pg. 81, Line 12 Pg. 82, Lines 13 thru 24 Pg. 83, Line 16 thru Pg. 84, Line 6 Pg. 84, Line 10 thru Pg. 85, Line 9 Pg. 85, Line 18 thru Pg. 89, Line 11 Pg. 89, Lines 20 thru Pg. 90, Line 17 Pg. 90, Line 25 thru Pg. 90, Line 17 Pg. 90, Line 25 thru Pg. 92, Line 4 Pg. 92, Lines 14 thru 18 Pg. 95, Lines 8 thru 10 Pg. 95, Lines 10 thru 23 Pg. 98, Lines 9 thru 20
Sytsma, James	06/26/2002	Everts v. Altec Industries, Inc.	Pg. 2, Lines 1 thru 12 Pg. 3, Lines 1 thru 18 Pg. 4, Line 20 thru Pg. 5, Line 15 Pg. 6, Line 6 thru Pg. 7, Line 22 Pg. 7, Line 25 thru Pg. 9, Line 1 Pg. 9, Line 18 thru Pg. 10, Line 22 Pg. 11, Line 1 thru Pg. 13, Line 21 Pg. 14, Line 18 thru Pg. 15, Line 8 Pg. 16, Lines 14 thru 20 Pg. 17, Lines 2 thru 22 Pg. 18, Lines 5 thru 9 Pg. 19, Lines 7 thru 15 Pg. 20, Line 14 thru Pg. 21, Line 17

	Pg. 21, Lines 22 thru 25
	Pg. 22, Lines 10 thru 15
	Pg. 22, Line 21 thru Pg. 25, Line 1
	Pg. 26, Line 6 thru Pg. 27, Line 5
	Pg. 27, Line 21 thru Pg. 28, Line 4
	Pg. 28, Line 19 thru Pg. 29, Line 8
	Pg. 29, Line 19 thru Pg. 30, Line 1
	Pg. 30, Line 8 thru Pg. 31, Line 5
	Pg. 31, Lines 13 thru 23
	Pg. 32, Line 10 thru Pg. 33, Line 3
	Pg. 33, Lines 5 thru 18
	Pg. 33, Lines 23 thru 25
	Pg. 36, Line 20 thru Pg. 37, Line 6
	Pg. 41, Line 22 thru Pg. 42, Line 16
	Pg. 42, Line 24 thru Pg. 45, Line 19
	Pg. 45, Line 24 thru Pg. 45, Line 19
	Pg. 48, Lines 11 thru 25
	Pg. 49, Lines 1 thru 11
	Pg. 49, Line 19 thru Pg. 50, Line 15
	Pg. 50, Line 24 thru Pg. 51, Line 3
	Pg. 51, Line 12 thru Pg. 52, Line 1
	Pg. 53, Lines 2 thru 9
	Pg. 55, Lines 20 thru 25
	Pg. 56, Lines 6 thru 21
	Pg. 57, Lines 1 thru 13
	Pg. 57, Line 22 thru Pg. 58, Line 2
	Pg. 59, Lines 21 thru 23
	Pg. 60, Lines 6 thru 15
	Pg. 61, Lines 13 thru 15
	Pg. 61, Line 19 thru Pg. 62, Line 4
	Pg. 62, Lines 8 thru 24
	Pg. 64, Line 7 thru Pg. 65, Line 3
	Pg. 65, Lines 10 thru 22
	Pg. 66, Lines 5 thru 21
	Pg. 67, Lines 16 thru 21
	Pg. 67, Line 23 thru Pg. 69, Line 8
	Pg. 69, Lines 14 thru 16
	Pg. 69, Line 21 thru Pg. 70, Line 19
	Pg. 70, Line 24 thru Pg. 71, Line 6
	Pg. 71, Line 9 thru Pg. 72, Line 20
	Pg. 74, Lines 5 thru 7
	Pg. 74, Line 15 thru Pg. 75, Line 9
	Pg. 76, Line 25 thru Pg. 77, Line 2
	Pg. 78, Lines 21 thru 25
	Pg. 82, Line 10 thru Pg. 83, Line 10
	Pg. 85, Lines 11 thru 19
<u> </u>	•

			D 06 L 61 16
			Pg. 86, Lines 6 thru 16 Pg. 87, Lines 13 thru 18 Pg. 90, Line 21 thru Pg. 91, Line 14 Pg. 94, Lines 6 thru 20 Pg. 95, Lines 3 thru 6 Pg. 95, Line 10 thru Pg. 96, Line 19 Pg. 96, Line 23 thru Pg. 97, Line 23 Pg. 98, Line 10 thru Pg. 98, Line 23 Pg. 99, Lines 7 thru 19 Pg. 100, Line 18 thru Pg. 101, Line 16 Pg. 103, Line 1 thru Pg. 104, Line 1 Pg. 104, Line 13 thru Pg. 105, Line 18 Pg. 106, Lines 18 thru 24 Pg. 107, Lines 3 thru 17 Pg. 108, Lines 1 thru 4 Pg. 109, Line 1 thru Pg. 110, Line 2 Pg. 110, Lines 4 thru 16 Pg. 112, Line 23 thru Pg. 113, Line 8 Pg. 113, Line 20 thru Pg. 114, Line 7 Pg. 116, Lines 2 thru 6 Pg. 116, Lines 9 thru Pg. 117, Line 16 Pg. 124, Line 10 thru 13 Pg. 124, Lines 10 thru 13 Pg. 124, Lines 10 thru 13 Pg. 124, Line 24 thru Pg. 125, Line 16 Pg. 124, Line 24 thru Pg. 126, Line 2 Pg. 127, Lines 8 thru 15
Anderson, Carl Michael	10/16/2002	Walters v. Altec Industries, Inc.	Pg. 6, Line 18 thru Pg. 9, Line 23 Pg. 10, Line 7 thru Pg. 11, Line 10 Pg. 19, Line 21 thru Pg. 20, Line 4 Pg. 21, Line 4 thru Pg. 22, Line 2 Pg. 22, Line 16 thru Pg. 23, Line 4 Pg. 25, Line 19 thru Pg. 26, Line 7 Pg. 40, Line 10 thru Pg. 51, Line 8 Pg. 59, Lines 8 thru 15 Pg. 62, Lines 12 thru 20 Pg. 82, Lines 3 thru 21 Pg. 83, Line 1 thru Pg. 97, Line 16 Pg. 98, Line 21 thru Pg. 99, Line 7 Pg. 116, Line 3 thru Pg. 119, Line 15 Pg. 145, Lines 11 thru 14 Pg. 146, Line 4 thru Pg. 147, Line 17 Pg. 148, Line 13 thru Pg. 149, Line 19 Pg. 161, Line 21 thru Pg. 162, Line 12

Bates, Daniel	01/16/03	Walters v. Altec Industries, Inc.	Pg. 5, Lines 7 and 8 Pg. 5, Line 22 thru Pg. 7, Line 6 Pg. 7, Lines 12 and 13 Pg. 7, Line 17 thru Pg. 54, Line 7
Chard, Joshua T.	10/16/02	Walters v. Altec Industries, Inc.	Pg. 7, Line 6 thru Pg. 8, Line 2 Pg. 10, Lines 1 thru 9 Pg. 30, Lines 5 thru 8 Pg. 32, Line 16 thru Pg. 33, Line 5 Pg. 38, Line 6 thru Pg. 39, Line 12 Pg. 42, Line 6 thru Pg. 44, Line 11 Pg. 45, Line 10 thru Pg. 46, Line 14 Pg. 47, Line 23 thru Pg. 50, Line 10 Pg. 54, Lines 4 thru 23 Pg. 56, Lines 8 thru 19 Pg. 63, Line 3 thru Pg. 64, Line 20 Pg. 67, Line 10 thru Pg. 69, Line 4 Pg. 70, Line 22 thru Pg. 74, Line 23 Pg. 79, Lines 4 thru 16
Chard, Joshua T.	02/27/03	Walters v. Altec Industries, Inc.	Pg. 5, Line 2 thru Pg. 8, Line 16 Pg. 10, Line 19 thru Pg. 11, Line 7 Pg. 11, Line 22 thru Pg. 14, Line 1 Pg. 16, Lines 8 thru 21 Pg. 18, Line 2 thru Pg. 21, Line 6 Pg. 23, Line 15 thru Pg. 33, Line 17 Pg. 34, Line 7 thru Pg. 37, Line 1 Pg. 38, Line 13 thru Pg. 42, Line 7 Pg. 43, Lines 1 thru 14 Pg. 46, Line 22 thru Pg. 47, Line 1 Pg. 48, Lines 4 thru 18 Pg. 49, Line 1 thru Pg. 51, Line 8 Pg. 51, Line 20 thru Pg. 57, Line 22 Pg. 58, Line 16 thru Pg. 59, Line 7 Pg. 60, Line 8 thru Pg. 71, Line 13 Pg. 73, Line 12 thru Pg. 75, Line 14 Pg. 80, Lines 4 thru 15 Pg. 83, Line 9 thru Pg. 86, Line 10 Pg. 86, Line 18 thru Pg. 88, Line 1
Hoffelmeyer, Richard	01/16/03	Walters v. Altec Industries, Inc.	Pg. 1, Lines 1 thru 19 Pg. 5, Line 6 thru Pg. 6, Line 12 Pg. 7, Lines 1 thru 7 Pg. 7, Lines 11 thru 15 Pg. 7, Lines 19 thru 22 Pg. 8, Lines 1 thru 10

T T
Pg. 8, Lines 16 thru 21
Pg. 9, Lines 19 thru 22
Pg. 11, Line 21 thru Pg. 12, Line 9
Pg. 24, Line 20 thru Pg. 25, Line 10
Pg. 25, Line 21 thru Pg. 28, Line 8
Pg. 28, Line 16 thru Pg. 29, Line 3
Pg. 34, Line 22 thru Pg. 36, Line 15
Pg. 37, Line 4 thru Pg. 39, Line 4
Pg. 39, Line 18 thru Pg. 40, Line 14
Pg. 41, Line 18 thru Pg. 42, Line 1
Pg. 43, Line 21 thru Pg. 44, Line 2
Pg. 47, Lines 3 thru 17
Pg. 48, Line 22 thru Pg. 49, Line 3
Pg. 49, Lines 7 thru 9
Pg. 49, Line 20 thru Pg. 50, Line 3
Pg. 51, Line 19 thru Pg. 52, Line 9
Pg. 52, Line 25 thru Pg. 53, Line 7
Pg. 56, Lines 14 thru 16
Pg. 56, Line 19 thru Pg. 57, Line 5
Pg. 57, Lines 6 thru 12
Pg. 57, Lines 13 thru 17
Pg. 57, Line 19
Pg. 58, Line 3 thru Pg. 61, Line 6
Pg. 61, Line 7 thru Pg. 63, Line 14
Pg. 73, Line 11 thru 18
Pg. 75, Lines 9 thru 24
Pg. 77, Lines 7 thru 12
Pg. 79, Line 20 thru Pg. 80, Line 16
Pg. 81, Lines 8 thru 16
Pg. 81, Line 19 thru Pg. 82, Line 3
Pg. 83, Lines 4 thru 21
Pg. 84, Lines 8 thru 11
Pg. 85, Lines 2 thru 14
Pg. 86, Line 3 thru Pg. 87, Line 4
Pg. 87, Line 5 thru Pg. 88, Line 12
Pg. 90, Line 23 thru Pg. 93 Line 17
Pg. 93, Line 18 thru Pg. 94, Line 7
Pg. 95, Lines 8 thru 20
Pg. 97, Lines 11 thru 23
Pg. 107, Line 24 thru Pg. 108, Line 23
Pg. 111, Lines 14 thru 16
Pg. 112, Lines 8 thru 15
Pg. 113, Line 21 thru Pg. 114, Line 18
Pg. 114, Line 22 thru Pg. 115, Line 4
Pg. 116, Line 21 thru Pg. 117, Line 15
Pg. 118, Lines 5 thru 12
<i>J.</i> -, -, -, -, -, -, -, -, -, -, -, -, -,

			Pg. 118, Line 22 thru Pg. 120, Line 12 Pg. 120, Line 21 thru Pg. 122, Line 7 Pg. 122, Lines 13 thru 17 Pg. 125, Line 23 thru Pg. 127, Line 6 Pg. 127, Line 18 thru Pg. 128, Line 2 Pg. 130, Lines 5 thru 13 Pg. 131, Lines 2 thru 18 Pg. 131, Line 25 thru Pg. 133, Line 20 Pg. 134, Lines 2 thru 6 Pg. 135, Lines 17 thru 21 Pg. 136, Lines 4 thru 17 Pg. 136, Lines 20 thru Pg. 137, Line 7 Pg. 138, Lines 1 thru 13 Pg. 141, Lines 2 thru 25 Pg. 142, Line 7 thru Pg. 143, Line 12 Pg. 143, Line 19 thru Pg. 145, Line 1 Pg. 145, Line 10 thru Pg. 146, Line 15 Pg. 147, Lines 9 thru 20 Pg. 148, Line 6 thru Pg. 149, Line 25
Mathis, Randy	01/06/03	Walters v. Altec Industries, Inc.	Pg. 4, Lines 8 and 9 Pg. 10, Lines 12 thru 14 Pg. 10, Line 21 thru Pg. 11, Line 3 Pg. 12, Line 21 thru Pg. 13, Line 12 Pg. 13, Line 25 thru Pg. 14, Line 19 Pg. 19, Line 9 thru Pg. 20, Line 11 Pg. 21, Line 7 thru Pg. 22, Line 8
Morgan, Dr. J. Derald	02/26/03	Walters v. Altec Industries, Inc.	Pg. 5, Line 2 thru Pg. 29, Line 12 Pg. 30, Lines 1 thru 14 Pg. 30, Line 21 thru Pg. 35, Line 6 Pg. 35, Line 18 thru Pg. 58, Line 13 Pg. 59, Line 6 thru Pg. 61, Line 17 Pg. 66, Line 22 thru Pg. 78, Line 6 Pg.122, Lines 8 thru 19 Pg. 127, Line 12 thru Pg. 133, Line 23 Pg. 134, Line 21 thru Pg. 136, Line 8
Spencer, Mike	01/23/03	Walters v. Altec Industries, Inc.	Pg. 3, Lines 10 thru 11 and 22 thru 25 Pg. 4, Lines 5 thru 13 Pg. 7, Lines 10 thru 14, Pg. 7, Line 19 thru Pg. 8, Line 24 Pg. 11, Line 18 thru 24 Pg. 12, Line 11 thru Pg. 13, Line 8 Pg. 13, Line 14 thru Pg. 16, Line 4 Pg. 19, Line 22 thru Pg. 20, Line 8, Pg. 20, Line 22 thru Pg. 23, Line 3

Pg. 25, Line 4 thru Pg. 26, Line 1
Pg. 26, Line 9 thru Pg. 27, Line 5
Pg. 28, Line 15 thru Pg. 29, Line 2
Pg. 29, Lines 7 thru 11
Pg. 29, Line 24 thru Pg. 30, Line 6
Pg. 30, Line 19 thru Pg. 31, Line 4
Pg. 33, Line 1 thru Pg. 35, Line 10
Pg. 35, Line 15 thru Pg. 38, Line 9
Pg. 39, Lines 6 thru 19
Pg. 41, Line 16 thru Pg. 44, Line 1
Pg. 44, Line 9 thru Pg. 46, Line 24
Pg. 47, Line 8 thru Pg. 50, Line 4
Pg. 50, Line 24 thru Pg. 51, Line 22
Pg. 53, Line 11 thru Pg. 54, Line 8
Pg. 54, Line 21 thru Pg. 57, Line 5
Pg. 58, Lines 3 thru 19
Pg. 59, Line 15 thru Pg. 60, Line 16
Pg. 62, Lines 7 thru 14
Pg. 62, Lines 16 thru Pg. 63, Line 18
Pg. 63, Line 20 thru Pg. 65, Line 6
Pg. 65, Line 8 thru Pg. 68, Line 6
Pg. 68, Line 20 thru Pg. 71, Line 3
Pg. 71, Line 8 thru Pg. 73, Line 18
Pg 74, Line 15 thru Pg. 76, Line 6
Pg. 76, Lines 11 thru 20
Pg. 77, Lines 6 thru 25
Pg. 80, Line 20 thru Pg. 81, Line 20
Pg. 81, Line 23 thru Pg. 83, Line 16
Pg. 84, Line 7 thru Pg. 86, Line 20
Pg. 92, Line 10 thru Pg. 94, Line 22
Pg. 95, Line 4 thru Pg. 96, Line 21
Pg. 96, Line 25 thru Pg. 100, Line 12
Pg. 113, Line 8 thru Pg. 118, Line 19
L

	1	T	
Sytsma, James	10/16/02	Walters v. Altec	Pg. 8, Lines 13 thru 22
		Industries, Inc.	Pg. 10, Line 6 thru Pg. 11, Line 8
			Pg. 12, Line 1 thru Pg. 17, Line 20
			Pg. 20, Lines 7 thru 12
			Pg. 22, Line 15 thru Pg. 26, Line 23
			Pg. 28, Lines 12 thru 19
			Pg. 30, Line 20 thru Pg. 31, Line 14
			Pg. 36, Line 19 thru Pg. 39, Line 7
			Pg. 41, Line 12 thru Pg. 43, Line 4
			Pg. 44, Line 22 thru Pg. 46, Line 8
			Pg. 46, Line 18 thru Pg. 48, Line 1
			Pg. 50, Line 12 thru Pg. 51, Line 15
			Pg. 70, Line 11 thru Pg. 72, Line 8
			Pg. 72, Line 19 thru Pg. 75, Line 17
			Pg. 76, Line 12 thru Pg. 77, Line 20
			Pg. 78, Line 3 thru Pg. 89, Line 8
			Pg. 91, Lines 10 thru 20
			Pg. 94, Line 13 thru Pg. 97, Line 8
			Pg. 101, Line 22 thru Pg. 102, Line 19
			Pg. 104, Line 12 thru Pg. 109, Line 6
			Pg. 109, Line 20 thru Pg. 117, Line 4
			Pg. 117, Line 13 thru Pg. 119, Line 14
			Pg. 119, Line 19 thru Pg. 126, Line 2
			Pg. 126, Line 16 thru Pg. 127, Line 12
			Pg. 129, Lines 11 thru 17
			Pg. 130, Line 8 thru Pg. 133, Line 21
			Pg. 135, Line 9 thru Pg. 138, Line 2
			Pg. 138, Line 23 thru Pg. 141, Line 20
			Pg. 142, Line 9 thru Pg. 144, Line 23
			Pg. 145, Line 13 thru Pg. 150, Line 3
			Pg. 152, Line 13 thru Pg. 154, Line 1
			Pg. 155, Line 13 thru Pg. 156, Line 1
			Pg. 157, Line 3 thru Pg. 158, Line 22
			Pg. 161, Line 11 thru Pg. 162, Line 20
			Pg. 163, Line 4 thru Pg. 171, Line 23
			Pg. 180, Lines 11 thru 18
			Pg. 183, Line 21 thru Pg. 184, Line 2
			Pg. 185, Lines 10 thru 22
			Pg. 191, Line 20 thru Pg. 192, Line 11
			Pg. 193, Line 22 thru Pg. 194, Line 15
			Pg. 200, Lines 11 thru 20
			Pg. 201, Line 9 thru Pg. 202, Line 14
			Pg. 216, Line 16 thru Pg. 217, Line 6
			Pg. 222, Lines 5 thru 15
			Pg. 256, Line 21 thru Pg. 258, Line 3

			Pg. 258, Line 20 thru Pg. 259, Line 13 Pg. 267, Lines 11 thru 21 Pg. 270, Lines 12 thru 21 Pg. 271, Line 13 thru Pg. 273, Line 23 Pg. 279, Line 5 thru Pg. 283, Line 7 Pg. 283, Line 12 thru Pg. 288, Line 5
Vollmer, Edwin	01/22/03	Walters v. Altec Industries, Inc.	Pg. 5, Lines 7 thru 9 Pg. 9, Lines 3 thru 7 Pg. 9, Line 20 thru Pg. 10, Line 16 Pg. 12, Line 20 thru Pg. 13, Line 11 Pg. 16, Line 17 thru Pg. 17, Line 11 Pg. 17, Lines 23 thru 25 Pg. 18, Line 6 thru Pg. 24, Line 8 Pg. 25, Line 22 thru Pg. 26, Line 5 Pg. 27, Lines 3 thru 22 Pg. 28, Line 18 thru Pg. 33, Line 20 Pg. 34, Lines 7 thru 14 Pg. 37, Lines 4 thru 24 Pg. 43, Line 2 thru Pg. Pg. 46, Line 21 Pg. 47, Line 19 thru Pg. 54, Line 18 Pg. 55, Line 3 thru Pg. 56, Line 3 Pg. 56, Line 15 thru Pg. 74, Line 1 Pg. 74, Line 16 thru Pg. 76, Line 4 Pg. 76, Lines 6 thru 19 Pg. 76, Line 21 thru Pg. 79, Line 15 Pg. 79, Line 17 thru Pg. 80, Line 18 Pg. 80, Line 21 thru Pg. 82, Line 16 Pg. 82, Line 21 thru Pg. 93, Line 16 Pg. 83, Line 19 thru Pg. 97, Line 11 Pg. 97, Line 16 thru Pg. 97, Line 11 Pg. 97, Line 16 thru Pg. 91, Line 20 Pg. 91, Line 16 thru Pg. 93, Line 14 Pg. 93, Line 19 thru Pg. 97, Line 11 Pg. 97, Line 16 thru Pg. 105, Line 6 Pg. 105, Line 8 thru Pg. 105, Line 6 Pg. 105, Line 8 thru Pg. 106, Line 13 Pg. 106, Line 15 thru Pg. 108, Line 3 Pg. 108, Line 19 thru Pg. 109, Line 5 Pg. 109, Lines 7 thru 10 Pg. 109, Lines 7 thru 10 Pg. 109, Lines 3 thru 6 Pg. 114, Lines 3 thru 6 Pg. 114, Lines 3 thru Pg. 115, Line 22 Pg. 115, Line 24 thru Pg. 115, Line 22 Pg. 115, Line 24 thru Pg. 117, Line 4

		T	<del></del>
Williams	01/16/02	Waltana	Pg. 117, Lines 6 and 7 Pg. 117, Lines 9 thru 22 Pg. 118, Lines 1 thru 24 Pg. 119, Lines 1 thru 7 Pg. 119, Lines 9 thru 20 Pg. 119, Line 25 thru Pg. 120, Line 2 Pg. 119, Lines 4 thru 9 Pg. 119, Lines 11 thru 22 Pg. 119, Lines 11 thru 22 Pg. 121, Lines 4 thru 12 Pg. 121, Lines 4 thru 12 Pg. 121, Lines 16 thru 21 Pg. 122, Lines 13 and 14 Pg. 122, Lines 19 thru Pg. 123, Line 6 Pg. 123, Lines 19 thru 22 Pg. 123, Lines 19 thru 22 Pg. 124, Line 25 thru Pg. 124, Line 2 Pg. 124, Line 4 thru Pg. 126, Line 13
Williams, Kelly	01/16/03	Walters v. Altec Industries, Inc.	Pg. 5, Lines 7 thru 15 Pg. 6, Line 11 thru Pg. 7, Line 4 Pg. 9, Line 14 thru Pg. 10, Lines 24 Pg. 12, Line 6 thru Pg. 22, Line 7 Pg. 23, Line 14 thru Pg. 26, Line 10 Pg. 30, Line 9 thru Pg. Pg. 34, Line 1 Pg. 34, Line 7 thru Pg. 37, Line 14 Pg. 37, Line 19 thru Pg. 43, Line 3 Pg. 43, Line 8 thru Pg. 45, Line 9 Pg. 45, Lines 13 thru 16 Pg. 45, Line 18 thru Pg. 51, Line 5 Pg. 49, Line 13 thru Pg. 59, Line 13 Pg. 51, Line 24 thru Pg. 63, Line 25 Pg. 64, Line 24 thru Pg. 65, Line 5 Pg. 66, Line 8 thru Pg. 67, Line 9 Pg. 67, Line 20 thru Pg. 68, Line 7 Pg. 68, Line 12 thru Pg. 69, Line 3 Pg. 69, Line 6 thru Pg. 77, Line 23 Pg. 78, Line 10 thru Pg. 80, Line 1 Pg. 80, Line 6 thru Pg. 81, Line 5 Pg. 91, Lines 7 thru 16 Pg. 92, Line 12 thru Pg. 93, Line 25 Pg. 95, Line 16 thru Pg. 97, Line 15 Pg. 96, Line 19 thru Pg. 97, Line 15 Pg. 97, Line 17 thru Pg. 102, Line 23

Hoffelmeyer, Richard	03/03/04	Sawyer v. Altec Industries, Inc.	Pg. 1, Lines 1 thru 13 Pg. 1, Line 19 thru Pg. 2, Line 23 Pg. 4, Line 8 thru Pg. 8, Line 17 Pg. 10, Lines 13 thru 17 Pg. 23, Lines 12 thru 20 Pg. 24, Lines 14 thru 20 Pg. 24, Line 25 thru Pg. 25, Line 9 Pg. 25, Line 19 thru Pg. 26, Line 4 Pg. 45, Line 17 thru Pg. 46, Line 4 Pg. 46, Line 25 thru Pg. 48, Line 2 Pg. 49, Lines 2 thru 9 Pg. 49, Lines 2 thru Pg. 51, Line 8 Pg. 51, Line 23 thru Pg. 52, Line 5 Pg. 53, Line 24 thru Pg. 54, Line 12 Pg. 61, Line 4 thru Pg. 62, Line 7 Pg. 63, Line 20 thru Pg. 65, Line 2
			Pg. 63, Line 20 thru Pg. 63, Line 2 Pg. 66, Lines 3 thru 18

/s/ John A. DeFrancisco

#### JOHN A. DeFRANCISCO DeFRANCISCO LAW FIRM

121 East Water Street Syracuse, New York 13202 (315) 479-9000 – Phone (315) 479-9300 – Facsimile

- and -

Joseph D. Lane
J. Farrest Taylor
Angela J. Mason
COCHRAN, CHERRY, GIVENS,
SMITH, LANE & TAYLOR, P.C.
163 W. Main Street
P. O. Box 927
Dothan, AL 36302
(334) 793-1555 – Phone
(334) 836-2500 – Facsimile

Attorneys for Plaintiffs

#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2004, I electronically filed Plaintiff's Proposed Voir Dire with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:

Robert J. Smith, Esq. rjs@ccf-law.com

Robert H. Hood, Sr., Esq. bobby.hood@hoodlaw.com

Robert H. Hood, Jr., Esq. bobbyjr.hood@hoodlaw.com

Timothy J. Fennell, Esq. tfennell@apfwlaw.com

/s/ John A. DeFrancisco

JOHN A. DeFRANCISCO